

UNITED STATES DISTRICT COURT EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION

TIMOTHY KING, MARIAN SHERIDAN,
JOHN HAGGARD, CHARLES RITCHARD,
JAMES DAVID HOOPER, and DARREN RUBINGH,

Plaintiffs,

v

Hon. Linda Parker
No. 2-20-cv-13134

GRETCHEN WHITMER, in her official capacity
as Governor of the State of Michigan,
JOCELYN BENSON, in her official capacity
as Michigan Secretary of State and the Michigan BOARD OF STATE
CANVASSERS,

Defendants, CITY OF DETROIT,
Intervening Defendant,

ROBERT DAVIS,
Intervening Defendant,

DEMOCRATIC NATIONAL COMMITTEE
and MICHIGAN DEMOCRATIC PARTY,
Intervening Defendant.

**PLAINTIFFS' EX PARTE MOTION TO EXCEED PAGE LIMIT FOR
PLAINTIFFS' OPPOSITION TO THE CITY OF DETROIT'S MOTION
FOR SANCTIONS, FOR DISCIPLINARY ACTION, FOR DISBARMENT
REFERRAL AND FOR REFERRAL TO STATE BAR DISCIPLINARY
BODIES AND TO THE DEFENDANTS WHITMER AND BENSON'S
CONCURRENCE IN CITY OF DETROIT'S MOTION FOR SANCTIONS**

Gregory J. Rohl (P39185)
Attorney for Plaintiffs
41850 West 11 Mile Road,
Suite 110 Novi, Michigan 48375
248.380.9404
gregoryrohl@yahoo.com

Stefanie Lambert Junttila (P71303)
Attorney for Plaintiffs
500 Griswold Street, Suite 2340
Detroit, Michigan 48226
248.270.6689
attorneystefanielambert@gmail.com

Heather S. Meingast (P55439)
Erik A. Grill (P64713)
Assistant Attorneys General Attorneys for Defendants
PO Box 30736
Lansing, Michigan 48909
517.335.7659
meingasth@michigan.gov
grille@michigan.gov

David Fink (P28235)
Attorney for Proposed Intervenor City of Detroit
38500 Woodward Avenue
Suite 350
Bloomfield Hills, Michigan 48304
248.971.2500
dfrink@finkbressack.com

Mary Ellen Gurewitz (P25724)
Attorney for Proposed Intervenor DNC/MDP
423 North Main Street, Suite 200
Royal Oak, Michigan 48067
313.204.6979
maryellen@cummingslawpllc.com

Scott R. Eldridge
Attorney for Proposed Intervenor DNC/MDP
One Michigan Avenue, Suite 900
Lansing, Michigan 48933
517.483.4918
eldridge@millercanfield.com

Andrew A. Paterson (P18690)
Attorney for Proposed Intervenor Davis
2893 East Eisenhower Parkway
Ann Arbor, Michigan 48108
248.568.9712
Aap43@outlook.com

**PLAINTIFFS' EX PARTE MOTION TO EXCEED PAGE LIMIT FOR
PLAINTIFFS' OPPOSITION TO THE CITY OF DETROIT'S MOTION
FOR SANCTIONS, FOR DISCIPLINARY ACTION, FOR DISBARMENT
REFERRAL AND FOR REFERRAL TO STATE BAR DISCIPLINARY
BODIES AND TO THE DEFENDANTS WHITMER AND BENSON'S
CONCURRENCE IN CITY OF DETROIT'S MOTION FOR SANCTIONS**

Now come Plaintiffs, SOUTHERN DIVISIONTIMOTHY KING, MARIAN
SHERIDAN, JOHN HAGGARD, CHARLES RITCHARD, JAMES DAVID
HOOPER, and DARREN RUBINGH, by counsel, and request that this Court
allow Plaintiffs to file a brief in response to the City of Detroit's Motion for
Sanctions, for Disciplinary Action, for Disbarment Referral, and for Referral to
State Bar Disciplinary Bodies and to the Defendants Whitmer and Benson's
Concurrence in the City of Detroit's Motion for Sanctions that exceeds the 25-page
limit established by L.R. 7.1(d)(3)(A) for good cause shown in light of the
important nature of this elections case. In support thereof, Plaintiffs state:

1. Because the legal questions before this Court are numerous and distinct and require the discussion of multiple factors, along with an application of the law to the facts, Defendants require additional pages to adequately make these arguments.
2. Plaintiffs brief is approximately 60 pages in length.

WHEREFORE, due to the important nature of this case and the legal questions presented, Plaintiffs' request to extend the page length to 60 pages is warranted and reasonable in this case.

Respectfully submitted,

/s/ Stefanie Lambert Junttila
STEFANIE LAMBERT JUNTILA(P 71303)
500 Griswold Street, Suite 2340
Detroit, Michigan 48226
(248) 270-6689
attorneystefanielambert@gmail.com

Date: January 18, 2021

Certificate of Service

I hereby certify that on January 19, 2020, I electronically filed the above document(s) with the Clerk of the Court using the ECF System, which will provide electronic copies to counsel of record.